REMARKS

Claim Status

Claims 1-6 are currently pending, with claims 1 and 6 being the only independent claims. Claims 1, 4 and 6 have been amended. The amendment to claim 4 is a minor correction to the claim wording, and is cosmetic in nature. Support for the amendment to claims 1 and 6 may be found, for example, at paragraph [0073] of published application no. 2005/0250480. No new matter has been added. Reconsideration of the application, as amended, is respectfully requested.

Overview of the Office Action

Claims 1-6 stand rejected under 35 U.S.C. §102(e) as anticipated by U.S. Publication No. 2003/0039237 ("*Forslow*").

Applicants have carefully considered the Examiner's rejection, and the comments provided in support thereof, and respectfully disagree with the Examiner's analysis. For the reasons which follow, it is respectfully submitted that all claims of the present application are patentable over the cited reference.

Patentability of the independent claims over the Prior Art under 35 U.S.C. §102

Independent claims 1 and 6 have both been amended to recite "<u>each of said plurality of communications networks having an associated addressing scheme</u>." Claim 1 has also been amended to recite "said system comprises at least one dedicated architecture manager (24) integrated into said terminal (10) ... and adapted to manage independently a plurality of said communications networks after receiving a non-unique address <u>via the associated addressing scheme</u> from each of said networks connected to the terminal (10)." Independent claim 6 has also been amended to recite the step of "receiving at least one address <u>of the associated</u>

addressing scheme coming from each of said communications networks connected to said terminal in said dedicated architecture manager (24) of said terminal (10)". Support for these amendments may be found, for example, at paragraph [0073] of published application no. 2005/0250480. No new matter has been added.

Forslow discloses a system and method for communication between a mobile station and an external network. Different packet-switched services and circuit-switched services are included in the external network. Forslow teaches a system in which a terminal is connected to only one external network at a time based on unique address planning (for the packet-switched services), and the addresses sent by this communication network are always different, i.e., Forslow teaches a single network having a unique address planning methodology. In the Forslow system, implementation costs are minimized by using the same internal equipment in a terminal for both communications methods, wherein only one procedure is used for accessing both the packet-switched services and circuit-switched services (see paragraph [0106]).

Forslow (paragraph [0022]) teaches the selection of the circuit-switched services for real time data streams (referred to as applications flows) such as, audio and video, or the selection of packet-switched bearers for non-real time applications such as surfing on the worldwide web, file transfer, e-mail, and telnet, all of which require fast channel access and bursty data transfer capability. Forslow (paragraph [0024]) teaches that this selection is performed based on a determination of whether a circuit-switched bearer or a packet-switched bearer is better suited to transport the application flow for a corresponding quality of service (QoS) associated with real-time or non real-time applications. Different packet-switched and circuit-switched services co-exist within the network, but the services are always located in the same network. However, Forslow teaches a system that only operates a network with a single addressing scheme, i.e., the

packed-switched network. The circuit switched services disclosed in *Forslow* do not provide an address for communicating.

Independent claim 1 of the present application recites the limitation "each of said plural communications networks having an associated addressing scheme, [wherein] ... at least one dedicated architecture manager (24) integrated into a terminal (10) ... [is] ... adapted to manage independently a plurality of said communications networks after receiving a <u>non-unique</u> address <u>via the associated addressing scheme</u> from each of said networks connected to the terminal (10)". *Forslow* fails to teach these features. Therefore, independent claim 1 is patentable over *Forslow* for at least this reason.

Forslow (paragraph [0029], lines 3-6) teaches that an external network entity performs <u>only a single common access</u> procedure for subsequent communications using either the circuit-switched network or the packet-switched network. *Forslow* (paragraph [0030], lines 1-2) states that "the <u>common</u> access procedure includes a <u>common authentication procedure</u> for authenticating the identity of the mobile station with the external network entity". *Forslow* (paragraph [0031], lines 3-7) teaches that the <u>common</u> access procedure configures the terminal for communication with the external network for both the circuit-switched and packet-switched networks. *Forslow* (paragraph [0032], lines 36-38) teaches that a higher QoS for different types of applications is achieved by permitting individual application flows to individually select the type of transfer mechanism, i.e., either a circuit-switched or a packet-switched bearer. In addition, *Forslow* (paragraph [0032], lines 5-7) teaches the use of the <u>common access procedure</u> for <u>all</u> application flows in a session. *Forslow* thus clearly teaches the use of <u>one</u> addressing scheme, i.e., a packet-switched addressing scheme.

Independent claim 1 of the present application recites that "a <u>non-unique</u> address <u>via the</u> <u>associated addressing scheme</u> from each of said networks connected to the terminal (10)" is

received. Independent claim 6 recites the step of "receiving at least one address of the <u>associated</u> <u>addressing scheme</u> coming from each of said communications networks connected to said terminal in said dedicated architecture manager (24) of said terminal (10)". *Forslow* fails to teach that multiple addressing schemes are used for a plurality of communication networks. Therefore, independent claims 1 and 6 are patentable over *Forlsow*.

The Examiner (pg. 5, item 4 thru pg. 6 of the Office Action) contends:

> The GSM currently defines three different classes of mobiles: Class A, class B, and class C. A class A mobile can make and receive traffic on both circuit-switched and packet-switched bearers simultaneously. A class B mobile supports activation and monitoring of circuit-switched and packet-switched services but can only send or receive traffic corresponding to application flows on one type of bearer at one time (para. #0083).

With respect to the foregoing, Applicants respectfully assert that a class C terminal is only used for packet-switched services. A class B terminal is used for bi-mode communication, but not simultaneous communication. A class A terminal is a bi-mode terminal that communicates with the circuit and packet-switched modes (e.g., switched voice communication with a packet data service). Here, however, two different addressing schemes are not used. That is, only <u>one</u> addressing scheme is used for the <u>packet-switched mode</u> for a class A terminal. As stated previously, the circuit-switched services do not provide an address for communicating.

In contrast, as disclosed at paragraph [0011] thru paragraph [0013] of the instant published application, for example, there are different "PDP contexts" that are specifically provided for connecting different addressing networks, i.e. its own addressing scheme (also see paragraph [0019]; paragraphs [0059] thru [0065] (IP or PPP or other addressing schemes) and paragraphs [0074] thru [0078] (independent network with its own addressing scheme)). *Forlsow* fails to teach such features.

Forlsow [0083] teaches that a data connection is established over the same circuit switched bearer, which is the same as using only one connection. F*orslow* (Fig. 9) teaches that the <u>same</u> internal equipment in a terminal is used for mutltiple connections. *Forslow* (paragraph [0094]) teaches that only <u>one</u> procedure is used for accessing both services, i.e. only one authentication procedure for accessing circuit and packet switched services. *Forlsow* (paragraph [0101]; Fig. 13) teaches that a <u>common</u> IP configuration procedure is used for both circuit and packet-switched services. *Forlsow* (paragraph [0101]) teaches that because the circuit and packet-switched services share the same IP termination and the same IP address in the mobile station, the common IP configuration for packet-switched services covers subsequent circuit-switched sessions. *Forlsow* thus clearly teaches that only one common addressing scheme is used. In the present claimed invention, however, each of plural communications networks has an associated addressing scheme. *Forlsow* fails to teach this feature.

In view of the foregoing, *Forslow* fails to anticipate independent claims 1 and 6. Reconsideration and withdrawal of the rejection under 35 U.S.C. §102 is therefore respectfully requested.

Moreover, due to the fundamental above-discussed differences between *Forslow* and independent claims 1 and 6, it is clear that claims 1 and 6 are unobvious over this reference under 35 U.S.C. §103.

Dependent claims

Claims 2-5 are dependent from claim 1. In view of the patentability of independent claim 1, for the reasons presented above, each of dependent claims 2-5 is patentable therewith over the prior art. Moreover, each of these claims includes features which serve to even more clearly distinguish the invention over the applied references.
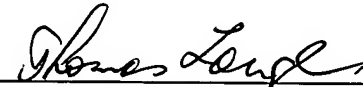
Conclusion

Based on all of the above, it is respectfully submitted that the present application is now in proper condition for allowance. Prompt and favorable action to this effect and early passing of this application to issue are respectfully solicited.

Should the Examiner have any comments, questions, suggestions or objections, the Examiner is respectfully requested to telephone the undersigned in order to facilitate reaching a resolution of any outstanding issues.

Respectfully submitted,
COHEN, PONTANI, LIEBERMAN & PAVANE LLP

By _____
Thomas Langer
Reg. No. 27,264
551 Fifth Avenue, Suite 1210
New York, New York 10176
(212) 687-2770

Dated: July 7, 2006